

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

STEPHEN ELLIOTT,

*Plaintiff,*

- against -

MOIRA DONEGAN, and JANE DOES (1-30),

*Defendants.*

**Oral Argument Requested**

No. 1:18-cv-05680-LDH-SJB

**SECOND DECLARATION OF MARTHA E. FITZGERALD**

MARTHA E. FITZGERALD declares as follows:

1. I am an associate at the law firm of Kaplan Hecker & Fink LLP and am counsel for Defendant Moira Donegan in this action.
2. I respectfully submit this declaration in further support of Ms. Donegan's Motion to Dismiss the Second Amended Complaint. For the Court's convenience, the exhibits attached hereto are numbered sequentially to the exhibit attached to my Declaration dated May 8, 2019.
3. Attached hereto as Exhibit B is a true and correct copy of an excerpt from Stephen Elliott, *The Adderall Diaries (A Memoir)* (2009).
4. Attached hereto as Exhibit C is a true and correct copy of Stephen Elliot, *The Score*, Believer Magazine, Mar. 1, 2007, <https://believermag.com/the-score/>.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed at: New York, New York  
June 20, 2019



Martha E. Fitzgerald